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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

17-CV-00667 PSL-MAT

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF WASHINGTON

3 LARRY G. HEGGEM
4 Plaintiff,

5 V.

6 BELLINGHAM POLICE DEPT;
7 OFFICER CHRISTOPHER KAISER;
8 OFFICER DAVID CRASS;
9 OFFICER MATTHEW ALLEN;
10 OFFICER ERIC KINGERY;
11 OFFICER BERNARD VODOPICH;
12 OFFICER DANEK;
13 DANIEL KELSH (incorrect);
14 PEACE HEALTH-ST JOSEPH HOSPITAL;
15 DR. WORTH EVERETT W. M. D.;
16 RN SHERRY CHRISTOPHERSON;
17 RN KELLY PORTEOUS;
18 ROBERT HUGHES M.D.
19 WHATCOM COUNTY SHERIFF;
20 WHATCOM COUNTY JAIL;
21 CHIEF WENDY JONES;
22 DR. STUART ANDREWS M.D.;
23 RN SUPERVISOR SALLY ANDREWS;
24 RN KATIE (DOE); ^{\$ Dentist}
25 JOHN and JANE DOE'S to be
26 Discovered; Defendants sued
27 individually and in their
28 official capacities.

29 Defendants.

No.

42 U.S.C
SECTION

1983

CIVIL
ACTION
COMPLAINT

- W -
Exhibit
Evidence

WEEKLY UNIT SUPPLY ORDER FORM

WASHINGTON STATE PENITENTIARY SHU / BAR UNITS

Name: John Lee
 DOC: 30
 Cell: Adam
 Week: 20

Place this form outside of your door before 10:00 PM, so Unit Officers on 1st Shift can fill your request of needed Unit Supplies. Once the form is received, you will then receive your requested supplies along with a new supply order form IF NEEDED. Supplies can be picked up when your door opens the next morning. Adams, Baker, and Rainier delivery days are all the same and specified below. Please check which items you would like along with how many of each. Items have a maximum established number available two times per week. Any form not listed below can be ordered in the written area below.

ITEMS/FORMS	Maximum Number Allowed	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
		MOD A	MOD B	MOD C	MOD A	MOD B	MOD C
KITES	5				-5		
MEDICATION REFILL FORM	3						
TOILET PAPER							
ONE FOR ONE EXCHANGE (EXCHANGE CORE)	3						
COMMISSARY FORM	1						
ACCESS FORM	1						
GENERIC ORDER FORM	1						
CLOTHING EXCHANGE FORM	1						
GRIEVANCE	2						
POSTAGE TRANSFER	4						
HEALTH SERVICE KITES	2						
RELIGIOUS DIET FORM	1						
RELIGIOUS SERVICES FORM	1						
VISITING QUESTIONNAIRE	1						
VISITING GUIDELINES	3						
VISITING SCHEDULE	2						
TRANSFER OF FUNDS	3						
Legal Copy/Mail Request	2						
WEEKLY SUPPLY FORM	1						

WRITTEN REQUEST FOR ITEMS NOT LISTED:

[Type here]

[Type here]

(Revised 08/13/15)

pg 2 of 5

1 In violation of the 4th, 5th, 8th Amendment
2 Under color of state law, defendants
3 used deadly excessive forces & prep-
4 arated fraud, thereafter, there
5 exerted deliberate indifference to
6 plaintiff's medical ~~rights~~ protection
7 - On 4/30/14
8 defendant officers, Haaser, Cross,
9 Allen, Kingery, and Daniels
10 used deadly excessive force on
11 plaintiff at the closed Whatcom
12 County Educational Credit Union.
13 Plaintiff was unarmed and
14 did not resist, but was severely
15 injured. See Exhibit "A" ~~B~~ in my
16 pictures enclosed. Officer
17 Vodopich withheld the truth;
18 and did not properly train his
19 officers. Daniel Fleish perpetrated
20 fraud and reported Plaintiff's injury
21 was only a minor dog bite cuts.
22 • Peace Health and its listed
23 medical defendants ~~lied~~ lied
24 minimized the injury.
25 Dr. Everett deliberately did not
26 order ~~re~~ release pain medi-
27 cations after release to the jail
28 leaving full well Plaintiff could
29 not take NSAID's or Tylenol or
30 Aspirin, causing plaintiff to

1 pg 3 of 6
2 the dentist ~~refused~~ ^{all} to remove my teeth that hurt
3 very ~~badly~~ ^{badly} from 4-30-14 to 10-21-14 it gave no pain
4 Suffer severe & excruciating
5 pain for 6 months. Dr. Andrew
6 Whittemore County Jail and
7 its officers, and subscribers
8 rates are guilty of ^{of} ~~of~~ ^{188th amendment} ^{amend} ^{protection}
9 Plaintiff's equal protection
10 right and deliberately also
11 left Plaintiff in severe
12 intractable, excruciating
13 pain by denying him adequate
14 pain medication from 4-30-14
15 to 10-21-14. RN, Katie ^{on 4-30-14}
16 was fully removed Plaintiff's
17 velcro volar splint which was
18 applied to my left wrist and
19 entire arm. There were surface
20 fractures too. It was suppose
21 to stay on for 30 days.
22 Dr. Andrew and Sally Andrew
23 knew that Katie did this too
24 and did nothing but leave
25 more in severe pain and agony
26 Prayer, For Relief

27 Monetary & punitive damages of
28 One million dollars against
29 Bellingham Police Dept, and
30 all the listed Defendants
31 Monetary & punitive damages
32 of One Million Dollars, against

pg 4 of 8 4/23/17
 PeaceHealth / St. Joseph's Hospital and Dr. Everett and his nurses

• Monetary / punitive damages of One Million Dollars against Whatcom County Sheriff, Whatcom County Tax; and against Dr. Stewart Andrews, Sally Andrews (an agent private) and all the rest of them listed.

• Under penalty of perjury I declare the foregoing to be true and correct.

~~Respectfully Submitted,~~ pro se.

~~Jerry Foggem - WSP 1313, 13th Avenue, Bellingham, WA 98262~~

• Defendants, Bellingham Police Dept & Officers 505 Grand Avenue, Bellingham WA 98225; • Defendant, PeaceHealth St. Joseph Hospital & doctors - 2901 Squalicum Hwy, Bellingham WA 98225; • Whatcom County Tax & Sheriff's Dept - 311 Grand Avenue, Bellingham WA 98225

Date: 04/23/17

Defendants, John & Jane Doe's acted with deliberate indifference to my 8th and 14th amendment rights and refused to prescribe opiate pain medication to relieve my severe teeth and gum pain. ALL my teeth needed to be removed. They denied this. I got all my teeth removed on 4-8-15 in prison. There's no excuse for this. John Doe wrongfully denied me my Hagonol for pain attacks even though I had an active prescription.

gray, but manage to perswade
bright and joyous day. Indeed, it's
is a bright day - one way or another

Larry G. Heggen # 259763
Bar Unit - Adam Gao
Washington State Penitentiary
Box 3 N. 13th Avenue
Olympia WA 98504-3132



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At Seattle
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

United States District Court
Court Clerk's Office 2310
700 Stewart Street
Seattle WA 98101

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